



JAMES K. SCHULTZ
Direct: (619) 296-2018
Cell: (312) 504-3485
jschultz@sessions.legal

March 20, 2023

Via ECF

The Honorable Paul G. Gardephe
United States District Court Southern District of New York
500 Pearl St., Room 740
New York, NY 10007

**Re: *Seaman, et al. v. National Collegiate Student Loan Trust 2007-2, et al.*
USDC SD NY, Case No. 1:18-cv-01781-PGG**

Dear Judge Gardephe:

We write on behalf of defendants regarding Magistrate Judge Moses' March 13, 2023 Report and Recommendation (Dkt. No. 423). For the reasons stated herein, defendants respectfully request this Court extend the March 27, 2023 deadline to file their Objections to the Report and Recommendation. Plaintiffs do not oppose the request.

The Report and Recommendation is 68 pages and covers numerous complicated and important issues – specifically the Court's jurisdiction to hear the case and class certification. Defendants expect to file joint Objections and believe additional time is warranted given the length of the Report, complexity of the issues, and the need to coordinate among the various defendants on a single submission. Accordingly, defendants respectfully request an extension to **April 14, 2023**, for defendants to file Objections to the Report and Recommendation. This letter was shared with and approved by counsel for all parties prior to filing.

Thank you for Your Honor's attention to this matter.

Respectfully submitted,

/s/ James K. Schultz

*Counsel for Transworld Systems Inc. and EGS
Financial Care, Inc.*

MEMO ENDORSED

Cc: Hon. Barbara Moses, U.S.M.J.
Counsel of record

The Application is granted.

SO ORDERED:

Paul G. Gardephe, U.S.D.J.

Dated: March 21, 2023